

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

In re:)
Johnny Darrell Lorick,) CASE #: 19-00252-JJG-13
Debtor.)

OBJECTION TO TRUSTEE'S MOTION TO DISMISS

COMES NOW the Debtor by counsel to object to Trustee's Motion to Dismiss.
As grounds, Debtor alleges:

1. Counsel spoke with the Debtor regarding this matter;
2. Debtor has hired a broker to sell his residence and an Application to Employ said broker has been filed to allow broker to sell Debtor's residence on behalf of the Estate, thereby providing money to unsecured creditors;
3. Counsel is obligated to preserve the rights of the Debtor by requesting a Final Hearing be set on Trustee's Motion to Dismiss.

WHEREFORE, counsel for the Debtor requests that this matter be resolved with a hearing on the Trustee's Motion to Dismiss and hereto objection filed by Debtor.

Date: 11/11/2020

Respectfully Submitted,

/s/ Michael J. Norris
Michael J. Norris (#15341-49)
Mike Norris & Associates, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that on **November 11, 2020**, a copy of the foregoing pleading was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System. Parties may access this filing through the Court's system.

U.S. Trustee Chapter 13 Trustee
Via electronic mail; and **via electronic mail.**

I further certify that on **November 11, 2020**, a copy of the foregoing pleading was mailed by first-class U.S. Mail, postage prepaid, and properly addressed to the following:

Debtor, Johnny Lorick, 6445 Harrison Ridge Blvd., Indianapolis, IN 46236.

/s/ Michael J. Norris
Michael J. Norris (#15341-49)
Mike Norris & Associates, P.C.